

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
BECKLEY**

**UNITED STATES OF AMERICA**

**v.**

**CRIMINAL NO. 5:22-cr-00048**

**LAKESHIA NICOLE SIMON**

**SENTENCING MEMORANDUM OF THE UNITED STATES**

Defendant Lakeshia Nicole Simon (“Simon”) straw purchased at least four firearms as part of a major gun trafficking conspiracy in which members of the conspiracy trafficked over 140 firearms to date from the Beckley, West Virginia area to Philadelphia. A guideline sentence would adequately reflect the serious nature of her crime and should serve to deter her and others from engaging in straw purchasing and gun trafficking, which has led to disastrous consequences in the instant case.

**I. Objections to Presentence Report**

The United States has no objections to the presentence report (“PSR”).

**II. Nature and Circumstances of the Offense**

Simon was a straw purchaser of several firearms which were trafficked in connection with the interstate gun trafficking scheme. The original Indictment charged Jones, Derrick Woodard, Shyheem Woodard-Smith, Hassan Abdullah, Denise Johnson, Ross, Tyana Bly, Stephanie Cohernour, Maurice Johnson, Arileah Lacy, Terri Lawhorn, Simon and Donte Webster and other known and unknown conspirators with being involved in a scheme to unlawfully enrich themselves by obtaining firearms in West Virginia for resale in Philadelphia, Pennsylvania. Seven other defendants involved in the scheme pled guilty to Informations charging them with offenses related

to the straw purchasing or illegal transfer of firearms: Brandon Lawson, Megan Bickford, Michelle Grim, Jaleel Delaney, Dejaha Morris, Sequoyah Swain, and Kyla Gilbert.

From mid-2020 through mid-2021, Jones worked with fellow gun traffickers Woodard, Woodard-Smith, and Abdullah and either directly solicited individuals to purchase firearms on their behalf, or used recruiters like Ross, Denise Johnson, Lawson, and Swain to do so. In the process of purchasing firearms from Federal Firearms Licensees (“FFLs”) in and around the Beckley, West Virginia area, straw purchasers—including Bickford, Bly, Cohernour, Delaney, Gilbert, Grim, Maurice Johnson, Lacy, Morris, Simon, and Webster—falsely certified on Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) Form 4473 that they were the actual buyers of firearms, when, in fact, they knew they were purchasing firearms for the gun traffickers.

Jones, who was the ringleader of the scheme, would give the recruiters or straw purchasers money either through Cash App, a mobile payment service, wire transfer, or sometimes in cash, so they could pay for the firearms purchased at FFLs in West Virginia. Jones would also compensate these individuals for their roles in the scheme. Jones, Woodard, Woodard-Smith, and Abdullah would often accompany the straw purchasers to the FFLs. Jones and his co-conspirators trafficked over 140 firearms as part of the scheme, 45 of which have been recovered at crime scenes primarily in Philadelphia.

### **III. Statutory Objectives**

A guideline sentence is needed to reflect the seriousness of the offense, provide a just punishment, as well as to afford general and specific deterrence against such criminal activity. Such a sentence is necessary to capture the full range of Simon’s conduct.

### **IV. Sentencing Options**

Simons faces a statutory maximum of 5 years for her conduct.

**Conclusion**

For the foregoing reasons, the United States requests that the Court sentence Simon to a guideline sentence.

Respectfully submitted,

UNITED STATES OF AMERICA

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**CERTIFICATE OF SERVICE**

It is hereby certified that the foregoing “SENTENCING MEMORANDUM OF THE UNITED STATES” has been electronically filed and service has been made on opposing counsel by virtue of such electronic filing on this 20th day of October, 2022.

/s/ Negar M. Kordestani

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